## UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

l Action No. 03 MDL 1570 (RCC)
1.

This document relates to:

Kathleen Ashton, et al. v. Al Qaeda Islamic Army, et al., 02-CV-6977;

Burnett, et al. v. Al Baraka Inv. & Dev. Corp., et al., 03-CV-5738;

Thomas E. Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al., 03-CV-9849;

Cantor Fitzgerald & Co., et al. v. Akida Bank Private Ltd., et al., 04-CV-7065;

Continental Casualty Co., et al. v. Al Qaeda, et al., 04-CV-5970;

Euro Brokers, Inc., et al. v. Al Baraka Inv. & Dev. Corp., et al., 04-CV-07279;

Federal Ins. Co., et al. v. Al Qaida, et al., 03-CV-6978;

New York Marine and General Ins. Co. v. Al Qaida, et al., 04-CV-6105;

Estate of John P. O'Neill, Sr., et al. v. Kingdom of Saudi Arabia, et al., 04-1922;

Pacific Employers Ins. Co., et al. v. Kingdom of Saudi Arabia, et al., 04-CV-7216;

Walter Tremsky, et al. v. Osama Bin Laden, et al., 02-CV-7300;

Vigilant Ins. Co., et al. v. Kingdom of Saudi Arabia, et al., 03-CV-8591;

World Trade Center Prop. LLC, et al. v. Al Baraka Inv. and Dev. Corp., et al., 04-CV-07280.

## NOTICE OF MOTION

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 54(b), defendants the Kingdom of Saudi Arabia, HRH Crown Prince Sultan bin Abdulaziz Al-Saud, HRH Prince Naif bin Abdulaziz Al-Saud, HRH Prince Salman bin Abdulaziz Al-Saud, HRH Prince Turki Al Faisal bin Abdulaziz Al-Saud, and the Saudi High Commission (collectively the "FSIA Defendants"), by and through undersigned counsel, hereby makes a limited appearance for the purpose of moving the Court, before the Honorable Richard C. Casey, United States District Judge, at the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York 10007, at a date and time to be determined by the Court, for an order pursuant to Federal Rule of Civil Procedure 54(b) certifying as final the orders

dismissing claims against the FSIA Defendants. A memorandum of law in support of this Motion is annexed hereto.

Respectfully submitted,

KELLOGG, HUBER, HANSEN, TODD, EVANS & FIGEL, P.L.L.C.

/s

Mark C. Hansen (admitted *pro hac vice*)
Michael K. Kellogg (admitted *pro hac vice*)
J.C. Rozendaal (admitted *pro hac vice*)

Sumner Square 1615 M Street, N.W. Suite 400 Washington, D.C. 20036-3209 (202) 326-7900

Attorneys for Prince Turki Al Faisal bin Abdulaziz Al-Saud and the Kingdom of Saudi Arabia

ROBBINS, RUSSELL, ENGLERT, ORSECK & UNTEREINER LLP

/s/

Lawrence S. Robbins (admitted *pro hac vice*)

1801 K. Street, N.W. Suite 411 Washington, D.C. 20009 (202) 775-4500

Attorney for the Saudi High Commission

BAKER BOTTS, LLP	LLP
------------------	-----

/s/ William H. Jeffress, Jr. (admitted *pro hac vice*) Christopher R. Cooper (admitted pro hac vice) Jamie S. Kilberg (admitted *pro hac vice*) Sara E. Kopf (admitted *pro hac vice*)

1299 Pennsylvania Ave., N.W. Washington, D.C. 20004 (202) 639-7700

Attorneys for Prince Salman bin Abdulaziz Al-Saud and Crown Prince Sultan bin Abdulaziz Al-Saud

## BRYAN CAVE, LLP

James M. Cole (admitted pro hac vice) James J. Murphy (admitted pro hac vice) Michael G. Biggers (admitted pro hac vice)

700 13<sup>th</sup> Street, N.W. Washington, D.C. 20005 (202) 508 6091

Attorneys for Prince Naif bin Abdulaziz Al-Saud

November 30, 2005